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8 *Attorneys for Plaintiff Criminal Productions, Inc.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 CRIMINAL PRODUCTIONS, INC., a Nevada
12 Corporation,

13 Plaintiff,

14 v.

15 MARIA JENKINS, an individual;
16 KIMBERLY CRAWFORD, an individual;
17 CHRISTINA SUTTON, an individual;
18 JULIUS LENON, an individual; JOSEPH
19 SMITH, an individual; TRACY CORDOBA,
20 an individual; MILES PILLUS, an individual;
21 RAIMOND PEREZ, an individual.

22 Defendants.

Case No.: 2:16-cv-02704-JCM-PAL

**STIPULATION AND ORDER TO SET
BRIEFING SCHEDULE ON AMENDED
MOTION TO VACATE JUDGMENT
(ECF 71)**

(Second Request)

23 Pursuant to Local Rule IA 6-1(a), Plaintiff Criminal Productions, Inc. (“Plaintiff” or
24 “CPI”) and Defendant Tracy Cordoba (“Defendant” or “Cordoba”), by and through their
25 undersigned counsel, stipulate to an order resetting the briefing schedule on CPI’s Motion to
26 Vacate (ECF 62) to commence from CPI’s amendment to that Motion (ECF 71). This stipulation
27 will have the effect of extending the deadline for Defendant to file her Opposition to Plaintiff’s
28 Motion to Vacate Judgment Awarding Attorneys’ Fees and Costs (ECF 62, as amended by ECF
71) from, June 14, 2018 to June 26, 2018. This is the second request for such an extension.

LR IA 6-1 provides that stipulations to extend may be granted upon a showing of good
cause when brought prior to the expiration of the relevant deadline. LR IA 6-1(a). There is good
cause to extend deadlines to provide responding parties with an equitable amount of time to

1 respond to amended pleadings or motions after they have stayed action in responding to the same
2 on representations of the filing party that an amendment to the filing may be forthcoming. Such
3 is the case here.

4 The Parties stipulated to the first extension (ECF 69) on the representation of Plaintiff's
5 counsel that Plaintiff may amend or narrow Plaintiff's Motion to Vacate. The process of assessing
6 issues raised by Defense Counsel, conferring with prior counsel and Plaintiff took longer than the
7 Parties originally intended, such that Plaintiff was unable to file its Amended Motion to Vacate
8 (ECF 71) until after close of business on June 12, 2018, two days before Defendants extended
9 deadline to file its opposition.

10 During the interim, Defense Counsel reasonably refrained from drafting an opposition, as
11 the motion to which it was to be filed might be amended, and Plaintiff's counsel represented that
12 as an amendment would likely be forthcoming, Plaintiff would stipulate to extend such a deadline
13 to provide Defense counsel with a reasonable amount of time to assess and respond to an amended
14 motion. The Amended Motion (ECF 71) removed the second argument of the original motion
15 (ECF 62) challenging the extent and legitimacy of the attorney's fees charged, but it left the
16 primary arguments in support of that portion of the Motion seeking to vacate the judgment
17 awarding attorneys' fees under Rule 60(b) unmodified. However, it was not until the day prior to
18 the deadline that Defense counsel could have known that to prepare an opposition, necessitating
19 this stipulation.

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1 Good cause, therefore, exists, and this stipulation to reset the opposition deadline from the
2 June 12, 2018, filing of the Amended Motion (ECF 71) to June 26, 2018 should be granted.

3 Dated: June 13, 2018

4 **WEIDE & MILLER, LTD.**

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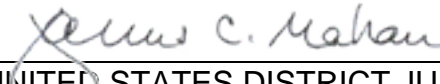
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8 *Attorney for Plaintiff Criminal Productions, Attorney for Defendant Tracy Cordoba*
9 *Inc.*

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11 **ORDER**

12 IT IS SO ORDERED

13 Dated June 15, 2018.

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16 UNITED STATES DISTRICT JUDGE